

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

3M COMPANY

Plaintiff,

v.

HULOMIL, LLC,

Defendant.

Civil Action No. 3:20-cv-00394

**DEFENDANT HULOMIL, LLC'S RESPONSE TO
PLAINTIFF 3M COMPANY'S MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

NOW COMES Hulomil, LLC, by and through the undersigned counsel, pursuant to Rule 65 of the Federal Rules of Civil Procedure, and respectfully shows unto the Court the following:

1. Defendant Hulomil, LLC ("Hulomil") is a North Carolina limited liability company who is in the business of selling medical supplies.
2. Prior to the filing of the Complaint, Hulomil, LLC had not received any correspondence or other notice with respect to the allegations in the Complaint filed by 3M Company ("3M").
3. Hulomil, LLC has not sold any 3M products.
4. Hulomil, LLC does not intend to sell any 3M products.
5. Hulomil, LLC's website clearly states "HULOMIL DOES NOT OFFER 3M PRODUCTS" and the website does not contain any 3M marks or logos. *See Exhibit 1*, printouts of *Hulomil.com website, from May 18, 2020*.

6. Accordingly, as Hulomil has not and does not sell 3M products and does not use the 3M mark, Hulomil does not oppose the entry of a temporary restraining order (“TRO”) and/or preliminary injunction limited to the express relief requested and set forth in Plaintiff’s 3M’s Motion for TRO and Preliminary Injunction enjoining Hulomil from using the 3M mark and selling 3M products. (Doc. #10)

7. Additionally, counsel on behalf of Hulomil has notified 3M’s counsel of Hulomil’s willingness to agree to the entry of a TRO as requested in 3M’s Motion.

Respectfully submitted, this the 18th day of May, 2020.

MURPHY DESMOND S.C.
Attorneys for Defendant

Electronically signed by /s/ Scott G. Salemi

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on all parties to this action by electronically filing the same with the Clerk of Court using the CM/ECF system, which caused notification of such filing to be emailed to the following parties of record:

Shayna Cook (*pro hac pending*)
Andrew J. Rima (Wis. Bar 1065851)
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Respectfully submitted, this the 18th day of May 2020.

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